

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

JAVIER CONCEPCION JIMENEZ
MARIA MERCEDES CONCEPCION

Debtor(s)

Case No: 10-07900 SEK

Chapter 13

MOTION TO INFORM AMENDED PLAN

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is that debtor will surrender to trustee any collections enforced received.

WHEREFORE, it is respectfully requested to this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 31st day of January of 2011.

JPC LAW OFFICE

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By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 10-07900-13

CONCEPCION JIMENEZ, JAVIER & MERCEDES CONCEPCION, MARIA

Chapter 13

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☐ PRE ☐ POST-CONFIRMATION

☒ AMENDED PLAN DATED: 1/31/2011

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 800.00 x 60 = \$ 48,000.00
 \$ _____ x _____ = \$ _____
 \$ _____ x _____ = \$ _____
 \$ _____ x _____ = \$ _____
 \$ _____ x _____ = \$ _____

TOTAL: \$ 48,000.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
 within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
 addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 48,000.00

III. ATTORNEY'S FEES

(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
 Disclosure Statement: \$ 2,714.00

Signed: /s/ JAVIER CONCEPCION JIMENEZ
 Debtor

/s/ MARIA MERCEDES CONCEPCION
 Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. <u>BBVA</u>	Cr. _____	Cr. _____
# <u>96168990447</u>	# _____	# _____
\$ <u>19,250.00</u>	\$ _____	\$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

4. ☒ Debtor SURRENDERS COLLATERAL to Lien Holder:

AHMSI COOPACA

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

COOP A/C VEGABAJENA

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
 11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____

☐ Paid 100% / ☐ Other: _____

Cr. _____	Cr. _____	Cr. _____
# _____	# _____	# _____
\$ _____	\$ _____	\$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
 See Continuation Sheet

CHAPTER 13 PAYMENT PLAN

Continuation Sheet - Page 1 of 1

FAILURE TO TIMELY OBJECT TO THIS PLAN BY A CREDITOR CONSTITUTES A WAIVER OF THE EQUAL MONTHLY AMOUNT METHOD OF PAYMENT 11 USC 1325 (a)(5).

ATTORNEY'S FEES WILL BE PAID AHEAD OF SECURED CREDITORS PER 11 USC 330.

TAX REFUNDS, IF ANY ARE RECEIVED BY DEBTOR, WILL BE TENDERED TO THE TRUSTEE AS PERIODIC PAYMENTS TO FUND THE PLAN UNTIL PLAN COMPLETION IN ADDITION TO PAYMENTS ALREADY PROVIDED HEREIN. IF DEBTOR(S) NEED TO USE ANY PART OF THESE FUNDS, PROPER AUTHORIZATION WILL BE SOUGHT FROM THE COURT FOR SUCH PURPOSE.

DEBTORS WILL PROVIDE INSURANCE IN FAVOR OF BBVA THROUGH EASTERN AMERICAN INSURANCE INC.

\$200 ADEQUATE PROTECTION TO BBVA

ANY PROCEEDS FROM COLLECTION EFFORTS LISTED IN SCHEDULE B, WILL BE SURRENDER TO TRUSTEE IN ORDER TO MAXIMIZE DISTRIBUTION TO CREDITORS IN THE PRESENT PROCEEDING.

Label Matrix for local noticing
0104-3
Case 10-07900-SEK13
District of Puerto Rico
Old San Juan
Wed Oct 6 14:32:12 AST 2010

RECOVERY MANAGEMENT SYSTEMS CORP
GE MONEY BANK (SAM'S CLUB)
25 S.E. 2ND AVENUE, SUITE 1120
MIAMI, FL 33131-1605

BANCO BILBAO VIZCAYA ARGENTARIA PR
ANGEL M. VAZQUEZ BAUZA
PO BOX 191017
SAN JUAN PR. 00919-1017

BANK OF AMERICA
P O BOX 1532
WILMINGTON, DE 19899-1532

CHASE
P O BOX 36520
LOUISEVILLE, KY 40233-6520

FIRST BANK / PRESTAMO PERSONAL
BANKRUPTCY DIVISION
PO BOX 9146
SAN JUAN PR 00908-0146

Rjm Acquisitions Llc
575 Underhill Blvd
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US Bankruptcy Court District of P.R.
U.S. Post Office and Courthouse Building
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PR 00936-6818

BBVA
P O BOX 3671397
SAN JUAN, PR 00936

COOP A/C VEGABAJENA
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VEGA BAJA, PR 00694-4622

FIRST BANK OF PR
FIA CARD SERVICES
P O BOX 15026
WILMINGTON, DE 19850-5026

SEARS
P O BOX 6241
SIOUX FALLS, SD 57117-6241

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

End of Label Matrix
Mailable recipients 24
Bypassed recipients 0
Total 24

COOP A/C VEGABAJENA
PO BOX 4622
VEGA BAJA, PR 00694-4622

AHMSI
P O BOX 619063
DALLAS, TX 75261-9063

BANCO SANTANDER
P O BOX 362589
SAN JUAN, PR 00936-2589

BPPR
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SAN JUAN, PR 00936-6818

COOPACA
P O BOX 1056
ARECIBO, PR 00613-1056

FIRST BANK OF PR
P O BOX 19327
SAN JUAN, PR 00910-1327

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DORADO, PR 00646

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